Dr. Jane Henney, Commissioner Food and Drug Administration 5360 Fishers Lane, Room 1061 (HFA-305) Rockville, MD 20852

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Docket Number 98P-1194

March 14, 2000

I am writing to request that the FDA remove rBGH from the market. I am making this request as a concerned citizen. I am not a scientist but I do not believe one has to be a scientist to use some common sense. Furthermore, I think decisions surrounding new technologies are too important to be left solely to the scientists and other so-called "experts" many of whom are in the employ of the very organizations who stand to profit most handsomely from their "science".

In fact, rBGH is a prime example of the very kind of aggressive corporate marketing which our regulatory agencies are supposed to hold in check, but with which they so often collude instead. How can a citizen possibly have faith in the decisions of agencies such as the FDA when there is so often a revolving door between FDA and corporations, in particular Monsanto, the corporate producer of rBGH? Michael R. Taylor, in particular, comes to mind in this case. The FDA approved rBGH for market based solely on safety assurances by Monsanto (the company poised to profit from the product). When reservations were expressed about the safety of rBGH by one of the FDA's senior scientists, Dr. Richard Burroughs, he was fired. The FDA position on rBGH was then written by a Monsanto scientist, Dr. Margaret Miller. Monsanto's own testing showed that the hormone was absorbed into the bloodstream of rats who were fed rBGH and that milk produced with rBGH contained up to five times the normal levels of IGF-1, the largest known risk factor for several common cancers. And yet, Monsanto and the FDA have both repeatedly insisted that milk treated with rBGH is no different than milk not so treated.

However, as this hormone treatment has been widely used in dairy farming in this country, and as results of independent research are made public, it has become obvious that there are vital concerns about human and animal health resulting from the use rBGH. Elevated levels of IGF-1 in milk lead to elevated levels in the blood of the human consumer because it is not destroyed in the digestion process and is easily absorbed across the intestinal wall. In addition to this cancer risk for humans, animals treated with rBGH have significant health and reproductive problems and a reduced life expectancy. As a result of mastitis infections, pus and elevated levels of white blood cells have been found in the rBGH milk. In addition, these animals are treated with high and ongoing doses of antibiotics which leave residues in milk, contributing to the growth of antibiotic resistance in bacteria, a pressing human health issue.

Can you really still stand by your position that rBGH milk is no different than milk from cows which have not been treated? Can you now do the job you should have done in 1993? In the interests of public (not corporate) health, you must remove rBGH from the market immediately.

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Thank you.

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